

1 J. Andrew Coombs (SBN 123881)  
andy@coombspc.com  
2 Nicole L. Drey (SBN 250235)  
nicole@coombspc.com  
3 J. Andrew Coombs, A Prof. Corp.  
517 East Wilson Avenue, Suite 202  
4 Glendale, California 91206  
Telephone: (818) 500-3200  
5 Facsimile: (818) 500-3201

JS-6

6 Attorneys for Plaintiff Warner Bros.  
Entertainment Inc.

7 Edward Maxwell  
8 Shaleen Maxwell a/k/a Sheena Maxwell  
a/k/a Sheena Soni a/k/a Shaleen Soni  
9 sheena.maxwell@fastmail.fm  
sheena.maxwell@gmail.com  
10 P.O. Box 492768  
Lawrenceville, GA 30049  
11 Telephone: (678) 699-5822

12 Defendants, *in pro se*

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15 Warner Bros. Entertainment Inc.,  
16  
17 Plaintiff,

18 v.

19 Edward Maxwell, an individual and d/b/a  
www.lostsilver.com, www.vsom.com and  
Video Search; Shaleen Maxwell a/k/a  
20 Sheena Maxwell a/k/a Sheena Soni a/k/a  
Shaleen Soni, an individual and d/b/a  
21 www.lostsilver.com, www.vsom.com and  
Video Search, and Does 1 through 10,  
22 inclusive,

23 Defendants.  
24

Case No. CV11-1850 RGK (MANx)  
[PROPOSED] CONSENT DECREE  
AND PERMANENT  
INJUNCTION

25 The Court, having read and considered the Joint Stipulation for Entry of  
26 Consent Decree and Permanent Injunction that has been executed by Plaintiff Warner  
27 Bros. Entertainment Inc. ("Plaintiff") and Defendants Edward Maxwell, an individual  
28 and d/b/a www.lostsilver.com, www.vsom.com and Video Search, and Shaleen

1 Maxwell a/k/a Sheena Maxwell a/k/a Sheena Soni a/k/a Shaleen Soni, an individual  
2 and d/b/a www.lostsilver.com, www.vsom.com and Video Search (collectively  
3 “Defendants”), in this action, and good cause appearing therefore, hereby:

4 ORDERS that based on the Parties’ stipulation and only as to Defendants, their  
5 successors, heirs, and assignees, this Injunction shall be and is hereby entered in the  
6 within action as follows:

7 1) This Court has jurisdiction over the parties to this action and over the subject  
8 matter hereof pursuant to 17 U.S.C. § 101 *et seq.*, and 28 U.S.C. §§ 1331 and 1338.  
9 Service of process was properly made against Defendants.

10 2) Plaintiff owns or controls the copyright or pertinent exclusive right to distribute  
11 or license the distribution of home video and digital products, including video home  
12 cassettes (VHS) as well as optical discs, including, but not limited to, video compact  
13 discs (VCDs), digital versatile discs (DVDs) and Blu-ray discs (collectively “Media  
14 Products”) incorporating the motion picture or television titles subject to the copyright  
15 registrations listed in Exhibit “A” attached hereto and incorporated herein by this  
16 reference (collectively referred to herein as “Plaintiff’s Works”).

17 3) Plaintiff has alleged that Defendants have made unauthorized uses of Plaintiff’s  
18 Works or substantially similar likenesses or colorable imitations thereof.

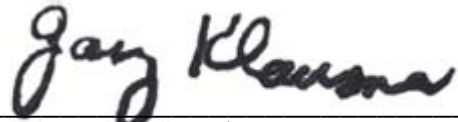
19 4) Defendants and their agents, servants, employees, representatives, successor and  
20 assigns, and all persons, firms, corporations or other entities in active concert or  
21 participation with him who receive actual notice of the Injunction are hereby  
22 restrained and permanently enjoined from infringing – directly, contributorily or  
23 vicariously – or enabling, facilitating, permitting, assisting, soliciting, encouraging,  
24 inducing, authorizing, aiding or abetting, materially contributing to, or persuading  
25 anyone to infringe in any manner Plaintiff’s Works, including, but not limited to, the  
26 following:  
27  
28

- 1 a) Copying, reproducing, downloading, distributing, uploading, linking to,  
2 transmitting, or publicly performing, or using trademarks, trade names or  
3 logos in connection with unauthorized Media Products containing any of  
4 Plaintiff's Works;
- 5 b) Enabling, facilitating, permitting, assisting, soliciting, encouraging,  
6 abetting, or inducing any person or entity to copy, reproduce, download,  
7 distribute, upload, link to, transmit, or publicly perform any of Plaintiff's  
8 Works; or
- 9 c) Profiting from the unauthorized copying, reproduction, downloading,  
10 distribution, uploading, linking to, transmission, or public performance of  
11 any of Plaintiff's Works while declining to exercise a right to stop or limit  
12 such unauthorized copying, reproduction, downloading, distribution,  
13 uploading, linking to, transmission, or public performance of any of  
14 Plaintiff's Works.
- 15 5) Each side shall bear its own fees and costs of suit.
- 16 6) Except as provided herein, all claims alleged in the Complaint are dismissed  
17 with prejudice.
- 18 7) This Injunction shall be deemed to have been served upon Defendants at the  
19 time of its execution by the Court.
- 20 8) The Court finds there is no just reason for delay in entering this Injunction and,  
21 pursuant to Rule 54(a) of the Federal Rules of Civil Procedure, the Court directs  
22 immediate entry of this Injunction against Defendants.
- 23 9) The Court shall retain jurisdiction of this action to entertain such further  
24 proceedings and to enter such further orders as may be necessary or appropriate to  
25 implement and enforce the provisions of this Injunction.
- 26 10) The above-captioned action, shall, upon filing by Plaintiff of the Settlement  
27 Agreement, Stipulation for Entry of Judgment and Judgment Pursuant to Stipulation,  
28

1 and requesting entry of judgment against Defendants, be reopened should Defendants  
2 default under the terms of the Settlement Agreement.

3 11) This Court shall retain jurisdiction over Defendants for the purpose of making  
4 further orders necessary or proper for the construction or modification of this consent  
5 decree and judgment; the enforcement hereof; the punishment of any violations  
6 hereof; and for the possible entry of a further Judgment Pursuant to Stipulation in this  
7 action.

8 DATED: June 16, 2011

9  
10   
11 Hon. R. Gary Klausner  
Judge, United States District Court  
for the Central District of California

12 PRESENTED BY:

13 J. Andrew Coombs, A Prof. Corp.

14 By: \_\_\_\_\_  
15 J. Andrew Coombs  
16 Nicole L. Drey  
Attorneys for Plaintiff Warner Bros.  
Entertainment Inc.

17 Edward Maxwell, an individual and d/b/a  
18 www.lostsilver.com, www.vsom.com and  
Video Search

19 By: \_\_\_\_\_  
20 Edward Maxwell, an individual and  
21 d/b/a www.lostsilver.com,  
www.vsom.com and Video Search  
Defendant, *in pro se*

22 Shaleen Maxwell a/k/a Sheena Maxwell  
23 a/k/a Sheena Soni a/k/a Shaleen Soni, an  
individual and d/b/a www.lostsilver.com,  
www.vsom.com and Video Search

24 By: \_\_\_\_\_  
25 Shaleen Maxwell a/k/a Sheena  
26 Maxwell a/k/a Sheena Soni a/k/a  
27 Shaleen Soni, an individual and d/b/a  
www.lostsilver.com, www.vsom.com  
and Video Search  
28 Defendant, *in pro se*

**EXHIBIT A**  
**PLAINTIFF'S WORKS**

Titles	Registration Numbers
Wonder Woman (1974 TV MOVIE)	LP 47005
An Enemy of the People (1978)	PA 28976
Age of Consent (1932)	R 242097
Devil Thumbs a Ride	R 575632
Hit Man, The (1972)	R 828284
Hercules Samson and Ulysses (1963)	RE 584423
Once a Thief (1964)	RE 584424
Assignment to Kill (1969)	RE 703858
Gypsy Moths (1969)	RE 759715
Eyes of Charles Sand, The (1972)	RE 830087
Phoenix City Story	RE 163421
Devil Makes Three (1952)	RE 43726
Your Cheatin' Heart	RE 588129
Wild, Wild Planet (1965)	RE 630140
Such Dust as Dreams Are Made On (1973) (Episode From "Harry O")	PA78205
China 9 Liberty 37 (1984)	PA 1702505
Deadly Trackers (1973)	RE 849212
Handle with Care (1958)	RE 279850
Iron Mistress (1952)	RE 508815
Justice League Series	COMPILATION Secret Origins PA 1-117-260; In the Blackest Night Part I PA 1-117-258 In the Blackest Night Part II PA 1-117-258; The Enemy Below Part I PA 1-117-266; The Enemy Below Part II PA 1-117-257
Longest Night, The (1936)	R 322918
Manhattan Melodrama (1934)	R 275548
Massacre (1934)	R 272619
No Blade of Grass (1970)	RE 782037
Room Service (1938)	R 373950
Tartars (Widescreen) (1961)	RE 441183
Wide Open (Widescreen) (1930)	R 187769